

82
SEP 27 1983

REGISTERED MAIL
RETURN RECEIPT REQUESTED

Mr. J. C. Patterson
Section Manager
Environmental Compliance
McDonnell Aircraft Company
Box 516, Dept. 191C
St. Louis, Missouri 63166

EPA I.D. No. MODO00818963

Dear Mr. Patterson:

LETTER OF WARNING

On July 6, 1983, a Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection was conducted at your facility, at which time the following areas of non-compliance were noted:

1. Approximately 44 drums, 3 cylinders of compressed gas and 4 cardboard boxes of laboratory chemicals were stored in the hazardous waste solvent storage area near the curb that divides the area. At the time of the inspection it had not been determined if the wastes in the containers were hazardous. This is a violation of 40 C.F.R. §262.11, which requires that a person who generates a solid waste must determine if that waste is a hazardous waste.

2. Some of the previously mentioned containers in the waste solvent storage area were in poor condition, rusted, dented, leaking and were not closed. If any of the drums that were open or in poor condition contain hazardous wastes your facility is in violation of 40 C.F.R. §265.171 and §265.173(a). It should be noted that if the waste in any of the containers proves to be non-hazardous as defined in RCRA, it is poor practice to store such in a hazardous waste storage area as it provides the opportunity for mislabeling and mismarking and can cause serious problems during subsequent handling or at the time of disposal.

3. If the waste in the solvent storage area is hazardous it cannot be stored or disposed of until a detailed chemical and physical analysis of a representative sample of the waste has been conducted, in accordance with 40 C.F.R. §265.13.

Symbol	AWCS	AWCS	AWCM	ARWM	ARWM
Name	Propanes	Cyflus	L.H.ons	OW	
Date	9/20	9/20	9/21/83	W	

9/20
cc
RB



R00144199
RCRA RECORDS CENTER

4. The facility operations manual does not contain instructions to inspect all monitoring equipment, safety and emergency equipment, and security devices, and it could not be documented that inspections of such are being conducted, in violation of 40 C.F.R. §265.15(b)(1).

5. There is no evidence that the facility's underground leak detection and monitoring system is tested and maintained to insure proper operation, in violation of 40 C.F.R. §265.33.

6. The sump at the drain in the containment system of storage area 2 was full thus allowing any overflow to go directly to the sanitary sewer. The sump must be inspected and maintained on a regular basis to insure proper performance in accordance with 40 C.F.R. §265.15(a).

In order that your current compliance status, regarding the above listed violations, can be assessed you are requested to submit the following documentation or certification:

1. The analytical results of the contents of each of the 44 drums, 3 cylinders and 4 cardboard boxes previously described in comment No. 1 of this letter. Also a determination as to which of the containers contain a hazardous waste as defined in RCRA.

2. That any hazardous wastes previously stored in containers in poor condition have been placed in containers that are in good condition. Also that any open containers containing hazardous waste are now closed.

3. Copy of inspection logs indicating that all monitoring equipment, safety and emergency equipment and security devices are being inspected. Also revised pages of the operations manual containing instructions to inspect such.

4. That the underground leak detection and monitoring is tested and maintained to insure proper operation.

5. That the drain sump in the containment system of storage area 2 has been cleaned out and is inspected on a regular basis to insure that it is operable.

Failure to submit the requested items within 15 days of receipt of this letter may result in appropriate enforcement actions by EPA.

It should be mentioned, that while conducting the inspection, 10 drums labeled as hazardous waste were located in a non-hazardous waste storage area. Upon further investigation and questioning of employees it was alleged that the drums contained unused commercial chemical products which had been erroneously labeled as hazardous waste. While this is apparently not a violation of the RCRA regulations it indicates a lack of "attention to detail" regarding your facilities hazardous waste management program. Further such a practice could lead to confusion and mishandling of materials so stored and labeled.

If you have any questions or comments, please contact Mr. Don Sandifer, of my staff, at 816/374-7133.

Sincerely yours,

David A. Wagoner
Director
Air and Waste Management Division

cc: Art Groner
Missouri Department Natural Resources

bcc: Robert Morby WMBR

Disk 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

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EPA-ARWM/WMBR
SEP 28 1983
Region VII K.C., MO

4. The facility operations manual does not contain instructions to inspect all monitoring equipment, safety and emergency equipment, and security devices, and it could not be documented that inspections of such are being conducted, in violation of 40 C.F.R. §265.15(b)(1).

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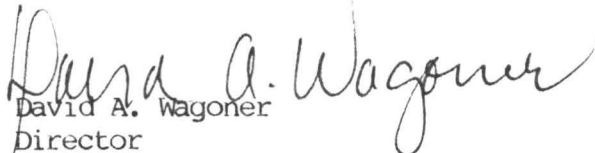
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